

## **REMARKS**

The Office Action dated October 23, 2007 has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 31, 35-36, 39-40, 42-43, 45-49, 54-56, 58-64, 66-70 and 72-75 have been amended to more particularly point out and distinctly claim the subject matter of the invention. No new matter has been added and no new issues are raised which require further consideration or search.

As a preliminary matter, the Office Action indicated that claims 54 and 61 include allowable subject matter, and would be allowable if amended to be in independent form. Based on the arguments presented below, Applicant submits that all of the presently pending claims are allowable and requests reconsideration of the presently pending claims.

Claims 31-33, 35-43, 45-51, 55-56, 58-60, 62 and 64-75 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,424,638 to Ray (hereinafter Ray) in view of U.S. Patent No. 6,882,844 to Keski-Heikkilä (hereinafter Keski-Heikkilä) or U.S. Patent No. 6,925,074 to Vikberg (hereinafter Vikberg) and U.S. Patent No. 6,289,221 to Ritter (hereinafter Ritter). According to the Office Action, Ray teaches all of the elements of claims 31-33, 35, 37-43, 45-51, 55-56, 58-60, 62 and 64-75 except for teaching using a cell identity information structure of a second telecommunication network. Thus, the Office Action combined the teachings of Ray and Keski-Heikkilä or

Vikberg and Ritter to yield all of the elements of claims 31-33, 35, 37-43, 45-51, 55-56, 58-60, 62 and 64-75. The rejection is traversed as being based on references that neither teach nor suggest the combination of features recited in each of claims 31-33, 35, 37-43, 45-51, 55-56, 58-60, 62 and 64-75.

Claim 31, upon which claim 32-35 and 64-66 depend, recites an apparatus that includes a data store configured to store a cell identity information for a cell of a first telecommunication network using a cell identity information structure of a second telecommunication network, and an identifier configured to identify the cell of the first telecommunication network as a neighboring cell by the second telecommunication network using the cell identity information stored in the data store. The first telecommunications network is a different network from the second telecommunications network.

Claim 36, upon which claim 37-41 depend, recites an apparatus that includes a data store configured to store a cell identity information for a cell of a first telecommunication network using a cell identity information structure of a second telecommunication network, and an identifier configured to identify the cell of the first telecommunication network as a neighboring cell by the second telecommunication network using the cell identity information stored in the data store. The cell identity information of the second telecommunication network comprises at least one of frequency, base station identification, or location area, and the first telecommunications network is a different network from the second telecommunications network.

Claim 42, upon which claims 43, 45, 47-48 and 67-69 depend, recites an apparatus that includes a receiver to receive cell identities from cells of a first telecommunications network and a second telecommunication network, wherein cell identities of cells from both the first telecommunications network and second telecommunication networks use the structure of the second telecommunication network. The apparatus further includes a determiner to determine the need to change serving cells, and to initialize the process of changing a serving cell to another cell, and a handover module to provide seamless mobility between the first telecommunications network and the second telecommunication network. The first telecommunications network is a different network from the second telecommunications network.

Claim 46 recites an apparatus that includes a receiver configured to receive cell identities from cells of a first telecommunications network and a second telecommunication network, wherein cell identities of cells from both the first telecommunications network and second telecommunication networks use the structure of the second telecommunication network. The apparatus further includes a determiner to determine the need to change serving cells, an initializer to initialize the process of changing a serving cell to another cell, and a handover module to provide seamless mobility between the first telecommunications network and the second telecommunication network, wherein the first telecommunications network is a different network from the second telecommunications network. The cell identity information of

the second telecommunication network comprises at least one of frequency, base station identification, or location area.

Claim 49, upon which claims 50-54 and 70-72 depend, recites a method that includes transmitting a cell identity information to a mobile station, the cell identity information being stored in a first telecommunication network using a cell identity structure of a second telecommunication network, and providing seamless mobility between the first telecommunication network and the second telecommunication network. The first telecommunications network is a different network from the second telecommunications network.

Claim 55, upon which claims 56, 58-63 and 73-75 depend, recites an apparatus that includes communicating means for communicating with a first telecommunication network and a second telecommunication network, and receiving means for receiving a cell identity information for a cell of the first telecommunication network using a cell identity information structure of the second telecommunication network wherein the first telecommunications network is a different network from the second telecommunications network. The first telecommunications network is a different network from the second telecommunications network.

Applicant submits that the cited references of Ray, Keski-Heikkilä, Ritter and Vikberg do not teach or suggest the combination of elements in any of the presently pending claims.

Ray teaches a system and method for performing a call handover between different types of systems. When a serving mobile switching center (MSC) determines that there is no other MSC to which a handover can be performed, the serving MSC sends a message to an Internet Gatekeeper that maintains a database of all existing wireless systems within a predefined area. The Internet Gatekeeper selects a target MSC of another wireless system, if possible, and transmits the identity of this target MSC to the serving MSC. Thereafter, the serving MSC performs the handover to the target MSC by routing signaling messages to the target MSC. See at least the Abstract. In addition, Ray discloses handing over a mobile station call between a first GSM cell 22a and a second GSM cell 22b (See FIGS. 2A and 3 of Ray). The handover process disclosed in Ray includes a handover between base stations belonging to the same GSM network. (Emphasis added)

Keski-Heikkilä teaches a GSM mobile communication system that includes multiple base stations which are connected to a base station controller (BSC) which is in turn connected to a cell broadcast server. The cell broadcast server includes a supervision software that is used to create or assign an extra, permanent identity to each base station. The permanent identity assigned to each base station is included in the information signal that is transmitted by the base station to all mobile equipments located in its coverage area or region. The supervision software and base station controller are responsible for continuing to maintain or preserve the same identity for each base station, even after changes are made to the network. Keski-Heikkilä further teaches the GSM

mobile communication system includes a terminal equipment that includes means for changing a subscriber profile on the basis of the identity of the particular base station that is currently serving that terminal equipment (please see column 3, line 11- column 4, line 12 of Keski-Heikkilä). Keski-Heikkilä discloses a common GSM network type for the entire cellular communication system network (see FIGS. 1a and 1b of Keski-Heikkilä). (Emphasis added)

Ritter discloses that a mobile telephone system includes a plurality of coupled based stations. Each base station has a first and second radio communications apparatus which operate to effect radio communications with least one mobile station via first and second radio signals with radio frequencies which occupy common part of the radio frequency spectrum. A frequency re-use pattern associated with the first radio communications apparatus is substantially matched to a frequency re-use pattern associated with the second radio communications apparatus. Ritter discloses using a GSM 1900 mobile radio communications system in combination with a Time Division/Code Division Multiple Access system (TD/CDMA). “The GSM system is a type of Time Division Multiple Access system” (see column 4, lines 54-59), therefore both the GSM and TD/CDMA networks both provide the same type of network service and are thus the same type of network. (Emphasis added)

Vikberg discloses a mobile telecommunications network with an access network portion having several base station systems that can communicate with a core network portion. The base station systems are adapted to communicate with mobile terminals over

a licensed public mobile network air interface and with the core network portion over a predetermined network interface. The network also includes at least one local base station system that is arranged to communicate with the core network portion over the predetermined network interface. This local base station system is further adapted to communicate with mobile terminals over an unlicensed radio interface. The local base station system makes use of an existing fixed network based on IP. Vikberg discloses that a mobile station is capable of operating in a GSM network and communicating with a core network 20. The dual network access provides the mobile station with access to its radio GSM network or to other networks via a radio interface.

Applicant submits that Ray, Keski-Heikkilä, Ritter and/or Vikberg do not teach or suggest the combination of elements recited in the pending claims. Each of the independent claims 31, 42, 46, 49 and 55, in part, recites a data store to store a cell identity information for a cell of the first telecommunication network using a cell identity information structure of a second telecommunication network, and where the first and second telecommunications networks are different. (Emphasis added)

The only reference that even attempts to disclose more than one type of network is Vikberg. Vikberg simply provides a mobile station with access to a core network, and does not teach or suggest to “store a cell identity information for a cell of a first telecommunication network using a cell identity information structure of a second telecommunication network” as recited, in part, in claim 31.

References Ray, Ritter and Keski-Heikkilä fail to disclose using a cell identity information structure of a second telecommunication network, and where the first and second telecommunications networks are different. (Emphasis added) or suggest a first and second type of network. (Emphasis added)

Vikberg fails to disclose using a cell identity information structure of a second telecommunication network. (Emphasis added).

Therefore, Applicant respectfully asserts that the rejection under 35 U.S.C. §103(a) should be withdrawn because neither Keski-Heikkilä, Ray, Ritter nor Vikberg, whether taken singly or combined, teaches or suggests each feature of claims 31, 42, 46, 49 and 55 and hence, dependent claims 32, 33, 36-41, 43, 45-48, 50-54, 56 and 58-75 thereon.

In response to the arguments recited in the Response to Arguments portion of the Office Action dated October 23, 2007, Applicants submit that certain claim recitations have been further clarified by the current amendments to the claims.

Applicants submit that the claim recitation “wherein the apparatus is configured to allow the cell of the first telecommunications network to be identified as a neighboring cell by the second telecommunication network”, of claim 31, is further clarified by the amendment stating that the first and second telecommunications networks are different types of networks.

In response to the question stated in the Office Action, which recites “is the first telecom network being identified as a neighbor using it’s “original” cell identity or as a



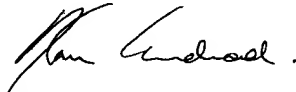
cell identify in the data store represented as being ‘part of the second telecom network’?”, Applicants submit that the question is referring to subject matter outside the scope of the recitations of claim 31. In an effort to answer the question based on the claim recitations, Applicants submit the following interpretation. The data store is configured to store cell identity information that identifies a cell of a first network. The cell identity information has a corresponding structure that is recognized by the second network. In addition, the cell of the first network is identified as a neighbor to the second network based on the stored cell identity.

As noted previously, claims 31-33, 35-43, 45-56 and 58-75 recite subject matter which is neither disclosed nor suggested in the prior art references cited in the Office Action. It is therefore respectfully requested that all of claims 31-33, 35-43, 45-56 and 58-75 be allowed, and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicant’s undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicant respectfully petitions for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



---

Kamran Emdadi  
Registration No. 58,823

**Customer No. 32294**  
SQUIRE, SANDERS & DEMPSEY LLP  
14<sup>TH</sup> Floor  
8000 Towers Crescent Drive  
Tysons Corner, Virginia 22182-2700  
Telephone: 703-720-7800  
Fax: 703-720-7802

KE/ksh:kh:cqc